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Perland Memorandum

TO: MICHAEL RODBURG **DATE:** AUGUST 9, 1990
FROM: BRUCE F. MILLER *BFM*
SUBJECT: DEAD CREEK SEDIMENT DEWATERING
REFERENCE: CONSENT DECREE ARTICLE XV FORCE MAJEURE

During our proposal to Cerro, we identified sediment dewatering as a critical path item for successful completion of the project. We allowed two to three weeks for the Gravity Dewatering Process. The material passing the Number 200 sieve is extremely hydrophilic. Water molecules attached to the fines are draining at a rate more slowly than we anticipated.

In the referenced Consent Decree Article, we have an obligation to notify IEPA and explain the circumstances which may delay the proper completion of any phase of the work. We also are to provide measures to be taken to prevent or mitigate the delay. We may request a time extension; however, a time extension for a critical path item would not achieve the objective of the project.

Several alternatives to speed sediment dewatering have been investigated:

- Mechanical dewatering, such as wicks or filter presses.
- Solidification with an hydrating agent such as cement.
- Treat all material not passing the Paint Filter Test at the TSDF.
- Move dewatered material into a stock pile for loading.
- Provide enough area so that sediments may dewater in thin layers. This would require additional area or the ability to move already dried sediment into stock piles outside the Creek banks.

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Perland believes the most feasible course of action is to solidify the material at the Site. Solidification also may provide unanticipated benefits by retarding leachability of the PCBs, lead and cadmium. We also believe that treatment under the provisions of RCRA is not an appropriate ARAR for this immediate response. I understand you are reviewing Illinois Code Section 703.142 and 750.430 to see if you can support this position.

We may not know until the September time frame if gravity dewatering will in fact be successful. We have not had any rain, weather conditions have been excellent, but our forecast is that we will not succeed in dewatering the material and could put the project in jeopardy. It is very fortunate that dewatering was started early, If we were on schedule, this problem would probably not have been identified until after the first of October. There would not have been time to correct the problem. We have time now.

Perland recommends the following: A change in the Work Plan to permit mixing with a hydrating agent such as cement, kiln dust or lime. The Work Plan would permit treatment only after attempts at gravity dewatering have put the transport and disposal schedule into jeopardy. We will have permission to use treatment but commit to gravity dewatering first.

Please contact me if you have any questions on this issue.

cc: J. Grana